

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JANE DOE, a sex trafficked individual,

Plaintiff,

v.

WYNDHAM HOTELS & RESORTS, INC.,
BRE/LQ PROPERTIES, LLC, LA QUINTA
INN & SUITES, LA QUINTA HOLDINGS
INC., LQ MANAGEMENT LLC, RANDY
ROES 1-100 (fictitious individuals not yet
known) and ABC CORPORATIONS 1-100
(fictitious businesses and corporations not yet
known),

Defendants.

Civil Action No.: 2:24-cv-11446-MCA-SDA

Hon. Madeline Cox Arleo, U.S.D.J.

Hon. Stacey D. Adams, U.S.M.J.

Document Electronically Filed

**JOINT STIPULATION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR
OTHERWISE RESPOND AND CONSENT ORDER**

Pursuant to Local Rule 6.1, Plaintiff Jane Doe (“Plaintiff”) and Defendants Wyndham Hotels & Resorts, Inc., La Quinta Holdings Inc., LQ Management L.L.C., and CPLG Properties, LLC (formerly known as BRE/LQ Properties, L.L.C.) (collectively, the “LQ Defendants”), by and through their respective undersigned counsel, hereby **STIPULATE** and **AGREE** that, upon approval of this Stipulation by the Court:

- The LQ Defendants’ time to answer, move, or otherwise respond to Plaintiff’s Complaint (ECF No. 1), shall be extended through and including May 11, 2025.

In support of this Stipulation, the parties jointly represent that:

1. Plaintiff filed her Complaint on December 23, 2024;

2. The LQ Defendants waived service of the Complaint on January 14, 2025, rendering a deadline of February 24, 2025 for them to move, answer, or otherwise respond to the Complaint;
3. On February 19, 2025, pursuant to Local Rule 6.1(b), the Clerk of Court granted the LQ Defendants an extension through and including March 10, 2025;
4. On March 10, 2025, pursuant to Local Rule 6.1(b) and upon joint stipulation of the parties, the Court granted the LQ Defendants an extension through and including April 11, 2025;
5. Plaintiff and the LQ Defendants agree that the extension sought in this Stipulation is acceptable to all parties and will not unduly delay these proceedings.

Dated: March 27, 2025

Respectfully submitted,

SBAITI & COMPANY PLLC

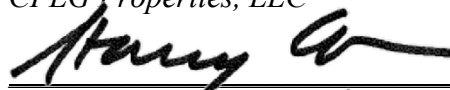
s/ Matthew Sicheri
Matthew Sicheri
100 Mulberry Street
3 Gateway Center, Suite 1102
Newark, NJ 07102
Tel.: (973) 954-2000
Fax: (973) 954-9710
Email: matthew.sicheri@sbaitilaw.com

Attorneys for Plaintiff Jane Doe

DLA PIPER LLP (US)

s/ David S. Sager
David S. Sager
51 John F. Kennedy Parkway, Suite 120
Short Hills, New Jersey 07078-2704
Tel.: (973) 520-2570
Fax: (973) 215-2604
Email: david.sager@us.dlapiper.com

*Attorneys for Defendants
Wyndham Hotels & Resorts, Inc.,
La Quinta Holdings Inc.,
LQ Management L.L.C., and
CPLG Properties, LLC*



HON. STACEY D. ADAMS, U.S.M.J.
DATED: March, 31, 2025